

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America
v.

BRIAN BRADLEY

Case No. **1:24-MJ-00335**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 7, 2024 in the county of Scioto in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

26 U.S.C. § 5681(b)

Receipt or Possession of an Unregistered Firearm

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

BRANSON T
YEAKLEY

Digitally signed by BRANSON T
YEAKLEY
Date: 2024.05.07 14:48:32 -04'00'

Complainant's signature

Branson Yeakley, Special Agent HSI

Printed name and title

Subscribed to and sworn before me by reliable electronic means, specifically, FaceTime video conference, pursuant to Fed. R. Crim. P. 4.1.

Date: May 7, 2024

Stephanie K. Bowman



Judge's signature

City and state: Cincinnati, Ohio

Stephanie K. Bowman, United States Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

**IN THE MATTER OF A CRIMINAL
COMPLAINT AND ARREST WARRANT
FOR:**

BRIAN BRADLEY

Case No. 1:24-MJ-00335

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Branson Yeakley, a Special Agent with Homeland Security Investigations, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI) and have been so employed since December 2023. I am a “Federal Law Enforcement Officer” as defined in Rule 41 of the Federal Rules of Criminal Procedure and am authorized by federal law to submit this affidavit for a criminal complaint and request an arrest warrant.

2. I have been a SA for the U.S. government since September 2019, where I was a SA with the Air Force Office of Special Investigations (OSI) until transferring to HSI in December 2023. As part of my training, I attended the Federal Law Enforcement Training Center (FLETC) Criminal Investigator Training Program (CITP) and the Air Force OSI Basic Special Investigator’s Course (BSIC), where I received training in firearms laws and conducting investigations of crimes involving firearms. I have also received subsequent training, both formal and informal, on investigating firearms offenses, including those offenses described in this affidavit. I have participated in investigations into drug trafficking, illegal use and possession of firearms, and various financial crimes where the subject(s) attempt to conceal the nature of their activity, such

as international money laundering. I am aware that individuals involved in the possession of unlawful machine guns nearly always tend to conceal their identities as well as the locations where they live. I have participated in the investigation of the offenses referred to above and have reviewed HSI reports, and reports prepared by other law enforcement agencies.

3. Throughout my career, I have conducted and participated in numerous federal investigations in multiple capacities, including working as a primary case agent. Further, I have worked with other federal law enforcement partners, as well as state and local departments, in Ohio and across the country. I have participated in various facets of investigation, including, but not limited to, physical and electronic surveillance, executions of search warrants, interview and interrogation, data analysis and arrest operations.

4. This Affidavit is submitted in support of an application for a criminal complaint charging Brian BRADLEY (hereinafter BRADLEY) with a violation of 26 U.S.C. § 5681(d) (Receipt or Possession of an Unregistered Firearm). I am familiar with the facts of this case. The information in this affidavit is based on my personal knowledge, as well as information provided to me by the other law enforcement officers involved in this investigation. Additionally, the information set forth below is not a complete recitation of all the facts known in this entire investigation. Rather, it is specific information that I believe supports probable cause for the issuance of the requested warrant. For the reasons stated below, based upon my training and experience, there is probable cause to believe that BRADLEY possessed unregistered firearms silencers stored at his residence in violation of 26 U.S.C. § 5681(b).

FACTS IN SUPPORT OF PROBABLE CAUSE

5. HSI is investigating Brian BRADLEY for violations of 18 U.S.C. § 922(o) (Transfer or Possession of a Machine Gun), as well as 26 U.S.C. § 5681(d) (Receipt or Possession

of an Unregistered Firearm). The investigation relates to BRADLEY's possession and receipt of machinegun conversion devices, also commonly known as a Glock switch or auto sears, as well as unregistered suppressors. This investigation involves evidence of BRADLEY's possession of machinegun conversion devices themselves.

6. The National Firearms Act (NFA) regulates the manufacture, sale, and transfer of certain firearms, referred to here as NFA firearms. Under 26 U.S.C. § 5845(a), silencers are considered NFA firearms and are defined in 18 U.S.C. § 921. Under 18 U.S.C. § 921(a)(25), a firearm silencer and firearm muffler are defined as “any device for silencing, muffling, or diminishing the report of a portable firearm, including any combination of parts, designed or redesigned, and intended for use in assembling or fabricating a firearm silencer or muffler, and any part intended only for use in such assembly or fabrication.” It is unlawful under 26 U.S.C. § 5861(d) to receive or possess a firearm (including a silencer) which is not registered to him in the National Firearms Registration and Transfer Record.

7. From September 6, 2022, through September 4, 2023, HSI received information from Customs and Border Protection (CBP) regarding the seizure of multiple packages from China addressed to Brian BRADLEY at 132 Andrea Drive, Wheelersburg, Ohio 45694. During CBP border searches of the packages, CBP officers discovered the packages addressed to BRADLEY contained firearms suppressors¹ and machinegun conversion devices. From September 6, 2022, through September 4, 2023, CBP agents intercepted and seized² the following packages addressed to BRADLEY at 132 Andrea Drive:

- a. September 6, 2022: one package containing one firearm suppressor;

¹ I know, based on my training and experience, that a firearm suppressor is a silencer under 18 U.S.C. § 921(a)(25).

² For each seizure, CBP officers sent via certified mail a “Notice of Seizure and Information to Claimants Non-CAFRA Form” which advised BRADLEY that the items were seized pursuant to 19 U.S.C. § 1595a(c)(1)(C), 49 U.S.C. § 80302(a)(2) - Firearm Imported by an Unregistered/Untaxed Importer.

- b. September 11, 2022: one package containing one firearm suppressor;
- c. October 10, 2022: one package containing one firearm suppressor;
- d. February 1, 2023: one package containing two machinegun conversion devices and one AR-15 drop-in auto sear;
- e. April 7, 2023: one package containing one machinegun conversion device and one AR-15 drop-in auto sear;
- f. September 4, 2023: one package containing one firearm suppressor.

8. HSI consulted ATF Intelligence and Research Specialist Shannon Wagner, who confirmed BRADLEY does not possess a license nor a tax stamp that would permit him to possess a suppressor. Under the National Firearms Act, it is unlawful to import a suppressor without being licensed to do so. A review of HSI and Customs databases further confirms BRADLEY does not possess any import licenses.

9. Subsequent investigation, including physical surveillance, confirmed that BRADLEY lived at 132 Andrea Drive, Wheelersburg, Ohio.

10. On May 1, 2024, the Honorable Stephanie K. Bowman, United States Magistrate Judge in the Southern District of Ohio, authorized a federal search warrant (Case Number 1:24-MJ-0315) to search BRADLEY's residence at 132 Andrea Drive, Wheelersburg, Ohio 45694.

11. On May 7, 2024, HSI agents executed this search warrant at 132 Andrea Drive, Wheelersburg, Ohio. During the execution of the search, agents recovered, among other things, the following items:

- a. 46 items that appear to be firearms suppressors, including one suppressor with a packaging label stating "suppressor";

- b. Four items that appear to be machinegun conversion devices and one item that appears to be a drop-in auto sear³;

12. During the execution of the search warrant, I interviewed BRADLEY after he was advised of his *Miranda* warnings. BRADLEY made the following admissions regarding his possession of firearms suppressors and machinegun conversion devices:

- a. At first, BRADLEY admitted to receiving and possessing 10-20 suppressors, two to three “Glock switches,” and one auto sear. He stated that these items were in a gold metal box in front of his television. Several of the above items were found in a gold metal box that was located in front of the television.
- b. BRADLEY later disclosed he possessed another box/tub in his house that contained firearms suppressors. Agents then discovered approximately 45 of the suppressors in the box BRADLEY identified.
- c. BRADLEY claimed to have never installed onto a firearm the Glock switches or auto sears, but admitted he used approximately 20 of the suppressors with a Walther P22 firearm.
- d. BRADLEY admitted that he purchased these items, including the firearms suppressors, using several different websites/payment methods, including but not limited to PayPal and Amazon.
- e. BRADLEY claimed to have never sold or given away any of the suppressors or machinegun conversion devices to any person.
- f. BRADLEY admitted all the items were his, and none of the items belonged to his children or wife.

³ The suspected machinegun conversion devices and drop-in auto sear have not yet been test fired.

13. Agents also interviewed BRADLEY's wife and during the interview, she said she knew nothing about firearms, and that all the firearms in the house belonged to BRADLEY.

14. BRADLEY's residence at 132 Andrea Drive, Wheelersburg, Ohio is in the Southern District of Ohio.

15. Based on my training and experience, and the investigation in this case, I believe that on or about May 7, 2024, in the Southern District of Ohio, BRADLEY unlawfully possessed unregistered firearms – that being unregistered silencers. I further believe that BRADLEY knew of the essential characteristics of the silencers. My belief is based on BRADLEY's admission to possessing the silencers found in his residence, my knowledge that BRADLEY previously attempted to order multiple firearms silencers, my knowledge that BRADLEY does not possess a stamp or have any NFA firearms registered to him, and BRADLEY's admission that he has used 20 of the silencers he possessed.

CONCLUSION

16. Based on the foregoing, I have probable and reasonable cause to believe that BRADLEY has committed violations and 26 U.S.C. § 5681(d) (Receipt or Possession of an Unregistered Firearm). These violations all occurred in the Southern District of Ohio. I request

that an arrest warrant be issued to bring BRADLEY before this Court based on the allegations contained herein.

Respectfully Submitted,

BRANSON T YEAKLEY

Digitally signed by BRANSON T
YEAKLEY
Date: 2024.05.07 14:49:01 -04'00'

BRANSON YEAKLEY

Special Agent

Homeland Security Investigations

Sworn to and subscribed before me by reliable electronic means, specifically, FaceTime video conference, pursuant to Fed. R. Crim. P. 4.1, on May 7, 2024.

Stephanie K. Bowman



HON. STEPHANIE K. BOWMAN
UNITED STATES MAGISTRATE JUDGE